

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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| In re: ERUS HOLDINGS LLC, Debtor. | Chapter 7 Case No. 23-11833-CTG |
| In re: ERUS BUILDERS, LLC, Debtor. | Chapter 7 Case No. 23-11834-CTG |
| In re: NATIONAL CLEAN ENERGY, LLC, Debtor. | Chapter 7 Case No. 23-11835-CTG Hearing Date: December 29, 2023 at 10:00 am (ET) Objection Deadline: December 20, 2023 at 4:00 pm (ET) |

**NOTICE OF MOTION TO AUTHORIZE JOINT ADMINISTRATION OF CASES
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 1015(b)**

TO: (a) the Office of the United States Trustee for the District of Delaware; and (b) those persons who have requested notice pursuant to Bankruptcy Rule 2002.

PLEASE TAKE NOTICE that on December 6, 2023, George L. Miller, as Chapter 7 Trustee (the “Trustee”) of the estates of Erus Holdings, LLC, Erus Builders, LLC, and National Clean Energy, LLC, (collectively, the “Debtors”) filed the *Motion to Authorize Joint Administration of Cases Pursuant to Federal Rule of Bankruptcy Procedures 1015(b)* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A copy of the Motion is attached hereto.

PLEASE TAKE FURTHER NOTICE that any response or objection to the relief sought in the Motion must be filed with the Bankruptcy Court on or before **December 20, 2023, at 4:00 p.m. prevailing Eastern Time.**

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon: (i) proposed counsel to the Chapter 7 Trustee, Gellert Scali Busenkell & Brown, LLC, 1201 N. Orange Street, Suite 300, Wilmington, DE 19801, Attn: Ronald S. Gellert, Esquire; and (ii) the Office of the United States Trustee, J. Caleb Boggs Federal Building, 844 N. King Street, Suite 2207, Lock Box 35, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE MOTION WILL BE HELD ON DECEMBER 29, 2023 AT 10:00 A.M. PREVAILING EASTERN TIME BEFORE THE HONORABLE CRAIG T. GOLDBLATT, UNITED STATES BANKRUPTCY JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 3rd FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801.

Dated: December 6, 2023

GELLERT SCALI BUSENKELL & BROWN, LLC

/s/ Ronald S. Gellert

Ronald S. Gellert (No. 4259)

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Proposed Counsel to the Chapter 7 Trustee